# Lake County COVID Housing Relief Program (CHRP) Program Manual

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# Background and Program Overview

This program manual is intended for all agencies who receive CDBG-CV or Coronavirus Relief Fund funding from Lake County's allocation of CARES Act funding.

The purpose of the COVID Housing Relief Program is to provide direct financial assistance and services to Lake County residents who have been financially impacted by the COVID-19 emergency.

#### **Terms**

- Housing Assistance Provider: For the purposes of this document, Housing Assistance Providers
   ("Providers") are organizations that provide direct financial assistance (rental or utility
   assistance) and other services to applicants, including case management or housing counseling.
   Catholic Charities, Community Partners for Affordable Housing, and Community Action
   Partnership are all Housing Assistance Providers.
- Legal Provider: For the purposes of this document, Legal Providers ("Legal Providers") are
  organizations that provide legal assistance to applicants, including landlord mediation. The Legal
  Providers for this program are limited to Prairie State Legal Services and North Suburban Legal
  Aid Clinic.

- ServicePoint: ServicePoint is the system where all beneficiary information will be entered and tracked for the purposes of program compliance.
- ServicePoint Referral Network: ServicePoint may be used to send an electronic referral from one agency to another agency on the network. This functionality is referred to as the ServicePoint Referral Network.

#### Overview of Process

- 1. Households may apply to the program via 211 or via the provider of their choice.
  - a. Households may call 211 to conduct screening and part of the intake process over the phone with a 211 operator. If eligible, households will be referred to the provider of their choice by the 211 operator via a ServicePoint electronic referral. In this situation, 211 will conduct screening and providers will complete the intake process.
  - b. Households may also apply directly to one of the providers according to the application submission preferences of that provider. In this situation, providers will need to conduct screening and, if the household is determined to be eligible, providers will need to complete the intake process from start to finish.
- 2. Providers will serve eligible households with rent or utility assistance for up to the value of one month's rent, capped at FMR for the unit size.
  - a. Households may return to apply for additional months of assistance.
  - b. If rental or utility arrears are paid, households may receive up the maximum amount of assistance in one payment.
- 3. Providers may provide eligible households with additional services, such as housing counseling.
  - a. Providers are expected to screen all clients to determine if legal assistance is required to help the household maintain their housing. If determined necessary, Providers are expected to send a referral through the ServicePoint Referral Network to one of the Legal Providers.
  - Providers are expected to refer clients to additional services (mainstream benefits, health care, mental health care, etc.) if it is determined the client has additional needs.
     Providers are encouraged to refer clients to additional services through the ServicePoint Referral Network when possible.
- 4. Providers will enter all beneficiary data into ServicePoint, including the total amount of assistance.
- 5. Providers will submit documentation to Lake County monthly with submission of vouchers.

# **Program Rules**

## Intake

- Intake can occur through any agency or through 211. 211 will guide the client to the agency
  most appropriate to that client's needs, but the client may ultimately select any agency that can
  serve them. For example, 211 will encourage clients with a history of homeless to be served by
  Catholic Charities, who has extensive experience serving clients with a history of homelessness.
- All agencies will use the same intake form.
- All agencies will enter clients into ServicePoint at intake. Agencies must check ServicePoint to
  ensure that the client has not been served (i.e. has a ServicePoint service entry) at another
  CHRP provider.

- All agencies must ask questions to determine if legal assistance is required. If legal assistance may be required, they will refer to a legal provider.
  - o If a client presents at a Legal Provider regarding housing issues, the legal provider will refer to a housing assistance provider if financial assistance is determined necessary.
- Applications can be submitted electronically via email, by mail, or dropped-off. Providers may choose to complete intake virtually or over the phone rather than receiving paper packets.
- Agencies will seek to process all applications within 5 business days.
- All applicants will be notified whether they are (i) approved, (ii) denied, or (iii) more information is needed within 10 business days. Notification can happen through a phone call or written notice (email or letter).

# Eligibility Criteria

- Total gross household income must be less than 80% AMI. Income limit includes all current income (employment, social security, disability, unemployment, etc.) but does not include CARES Act payments. Income is projected based on source documentation for the last 30 days of income.
- Applicants will not be required to prove that they can maintain their housing costs beyond the months of assistance offered.
- Total household liquid assets must be less than \$7,500.
- Applicants who currently receive a housing choice voucher or other federal or state housing subsidy
  may not receive rental assistance; however, they may be eligible for utility assistance. Providers
  must determine whether the applicant receives a utility allowance from their rental subsidy
  provider. If the applicant receives a utility allowance, CHRP providers may assist the applicant with
  only the portion of the utility bill that is not covered by the utility allowance.
- Applicants must be able to show documentation that they have been financially impacted by COVID-19, either due to a reduction in income (layoff notice, unemployment statement, documented reduction in hours, etc.) or unexpected medical bill. Eligible circumstance include:
  - o Required to be guarantined based on diagnosis of COVID-19.
  - o Required to self-quarantine based on a Directive of the Governor, the advice of a healthcare provider, or the advice or directive of a local or state public health authority, the directive of a law enforcement officer, or have reason to believe that self-quarantine is in the best interest of public health and human safety due to an exposure or high-risk activity.
  - o Required to self-quarantine based on age over 65 or health condition that places him/her at enhanced risk for COVID-19.
  - o Suffered a substantial loss of income from COVID-19, including:
    - Job loss;
    - Reduction in compensation;
    - Closure of place of employment;
    - Obligation to be absent from work to care for home-bound school-aged child; or
    - Other pertinent circumstances
  - o Experienced a large unexpected medical cost related to COVID-19.

| Income Limits- Effective June 28, 2019 |          |          |          |          |          |          |          |          |
|--|----------|----------|----------|----------|----------|----------|----------|----------|
| AMI                                    | 1 Person | 2 Person | 3 Person | 4 Person | 5 Person | 6 Person | 7 Person | 8 Person |
| 30%                                    | \$18,750 | \$21,400 | \$24,100 | \$26,750 | \$28,900 | \$31,050 | \$33,200 | \$35,350 |

| 50%  | \$31,200 | \$35,650 | \$40,100 | \$44,550  | \$48,150  | \$51,700  | \$55,250  | \$58,850  |
|------|----------|----------|----------|-----------|-----------|-----------|-----------|-----------|
| 60%  | \$37,440 | \$42,780 | \$48,120 | \$53,460  | \$57,780  | \$62,040  | \$66,300  | \$70,620  |
| 80%  | \$49,950 | \$57,050 | \$64,200 | \$71,300  | \$77,050  | \$82,750  | \$88,450  | \$94,150  |
| 100% | \$62,400 | \$71,300 | \$80,200 | \$89,100  | \$96,300  | \$103,400 | \$110,500 | \$117,700 |
| 120% | \$74,880 | \$85,560 | \$96,240 | \$106,920 | \$115,560 | \$124,080 | \$132,600 | \$141,240 |

| Income Limits- Effective July 1, 2020 |          |          |          |           |           |           |           |           |  |
|---------------------------------------|----------|----------|----------|-----------|-----------|-----------|-----------|-----------|--|
| AMI                                   | 1 Person | 2 Person | 3 Person | 4 Person  | 5 Person  | 6 Person  | 7 Person  | 8 Person  |  |
| 30%                                   | \$19,150 | \$21,850 | \$24,600 | \$27,300  | \$29,500  | \$31,700  | \$33,900  | \$36,050  |  |
| 50%                                   | \$31,850 | \$36,400 | \$40,950 | \$45,500  | \$49,150  | \$52,800  | \$56,450  | \$60,100  |  |
| 60%                                   | \$38,220 | \$43,680 | \$49,140 | \$54,600  | \$58,980  | \$63,360  | \$67,740  | \$72,120  |  |
| 80%                                   | \$51,000 | \$58,250 | \$65,550 | \$72,800  | \$78,650  | \$84,450  | \$90,300  | \$96,100  |  |
| 100%                                  | \$63,700 | \$72,800 | \$81,900 | \$91,000  | \$98,300  | \$105,600 | \$112,900 | \$120,200 |  |
| 120%                                  | \$76,440 | \$87,360 | \$98,280 | \$109,200 | \$117,960 | \$126,720 | 135,480   | \$144,240 |  |

#### **Assistance Limitations**

- Rental applicants may receive rent and utility assistance equal to one month's rent, capped at the
  applicable Fair Market Rent for the households' unit size. As the FMR amount changes on July 1,
  2020, rental and utility assistance for the same unit will have a different maximum for months prior
  to July 1 than for months after July 1, 2020.
- Homeowner households may receive utility assistance for one month. There is no dollar maximum for assistance; however, in no circumstance may a utility assistance payment exceed the dollar amount of the bill(s) for gas and electricity incurred during the month. Households may not receive assistance for unpaid balances from months other than the 6 months they receive assistance for.
- Utilities are limited to electric and gas only.
- Applicants may apply for up to five additional months of assistance, as needed and as funds are available. The total maximum assistance per household is six consecutive month's rent at FMR.
  - O Applicants may apply for utility assistance but are expected to explore other utility assistance programs. If applicants are not able to receive assistance through other programs, the Housing Assistance Provider may pay for up to six consecutive months of utilities. The total amount of rental assistance and utility assistance combined must not exceed the FMR for the unit size.
  - o If applying for rental or utility arrears, providers may serve a household with the maximum assistance, as applicable. It is not necessary for applicants to submit paperwork for each month's assistance separately.
  - o The six months of assistance must be consecutive.
- Applicants may not receive rental assistance or utility assistance from other sources to cover the same costs during the same period of time.
- Rental or utility arrears are eligible for payment; no payments will be made towards unpaid arrears incurred prior to March 2020.
- If a household is facing eviction, rental arrears and/or assistance may only be provided if the provision of assistance will prevent the eviction. If an eviction cannot be avoided, funding should instead be used to provide a security deposit and/or first month's rent to the client.
- Landlord must complete a landlord verification form and accept rent directly from agency.

| Rent Limits – Effective June 28, 2019 |       |         |         |         |         |         |         |
|---------------------------------------|-------|---------|---------|---------|---------|---------|---------|
|                                       | 0 BR  | 1 BR    | 2 BR    | 3 BR    | 4 BR    | 5 BR    | 6BR     |
| Fair Market Rent                      | \$915 | \$1,044 | \$1,212 | \$1,542 | \$1,844 | \$2,121 | \$2,397 |

| Rent Limits - Effective July 1, 2020 |       |         |         |         |         |         |         |
|--------------------------------------|-------|---------|---------|---------|---------|---------|---------|
|                                      | 0 BR  | 1 BR    | 2 BR    | 3 BR    | 4 BR    | 5 BR    | 6BR     |
| Fair Market Rent                     | \$956 | \$1,076 | \$1,248 | \$1,585 | \$1,888 | \$2,171 | \$2,454 |

# Income Determinations

Income is determined based on the definition of income in 24 CFR 5.609, also knows as the "Part 5" or "Section 8" definition.

- Whether a household's income is at or below 80% AMI is determined based on the household size and annual income. Household size includes all persons living in the household, regardless of age or relation, with a few exceptions. For more guidance on household size, please see the chart below.
  - Note: There are special circumstances for students that reside in the house part of the year. If students are included in the household size, then their income must also be included in the household income. If the student is a full-time student over the age of 18, only the first \$480 of their income must be included in the household income. Earnings in excess of \$480 may be excluded from the households' total income calculation.
- Income is determined based on the household's annual gross income. This includes the income of all individuals age 18 or above living in the household, regardless of relation. For more guidance on household income, please see the chart below.
- Temporary, nonrecurring payments to the family, including the Economic Impact Payment (stimulus payment), do not count towards household income.
- For more guidance regarding income inclusions and exclusions, please see: Part 5 (Section 8)
   Income Inclusions and Exclusions:
   https://files.hudexchange.info/resources/documents/HUD P5 Inclusions Exclusions.pdf

|   | Include in number of household members? | Include in amount of household income? |
|---|---|--|
| All adults who live in the residence, regardless of familial status | YES                                     | YES                                    |
| Foster children, legal kinship guardians, or foster adults          | NO                                      | NO                                     |
| Live-in aids/children of live-in aids                               | NO                                      | NO                                     |

| Temporarily absent household members expected to return (temporarily incarcerated, seasonal workers, active military) | YES     | YES     |
|---|---------|---------|
| Permanently absent household members not expected to return (residents of nursing homes)                              | NO      | NO      |
| Other absent household members (students)   | YES/NO* | YES/NO* |
| All children who live in the residence, regardless of familial status   | YES     | NO      |
| Shared custody children that live in HOME unit household at least 50% of the time                                     | YES     | NO      |

<sup>\*</sup>If you include absent adults in the count of household members, you must include their income. This applies to students who live in the household part of the time.

# Client Documentation Guidance

## Documentation required:

- 1. Intake Packet
- 2. Authorization for the Release of Information
- 3. Authorization to Share Information Using ServicePoint (if intake is conducted through 211, this requirement may be met with verbal consent)
- 4. Income Documentation (requirement may be met by self-employment certification form or zero income certification form as applicable)
- 5. Documentation of COVID-19 Impact
- 6. Landlord Verification Form
- 7. If utility assistance is requested, utility statements are also required
- 8. If the client is returning for additional assistance, a Self-Certification for Continued Assistance

#### Intake Packet

The intake packet is the client's application and contains all the information required by the CHRP Program. Providers are permitted to ask for additional information for the purposes of serving the client; however, it is expected that all CHRP providers will use the same application for the CHRP program.

Applications certify that the client is not receiving the same benefits elsewhere and must be signed. Electronic signatures are acceptable.

#### Authorization for the Release of Information

The Authorization for the Release of Information authorizes the provider to be able to obtain or share information for the purposes of the program. This enables the provider to contact the landlord on behalf of the client. Electronic signatures are acceptable.

#### Authorization to Share Information Using ServicePoint

The Authorization to Share Information Using ServicePoint authorizes the provider to be able to enter client data into ServicePoint. This is a requirement of the program. Clients who refuse to sign the

Authorization to Share Information Using ServicePoint cannot be served by CHRP. Clients may, however, refuse to answer some questions on the intake packet if they are not comfortable sharing that information, such as Social Security Numbers and disability information.

Verbal consent cannot be accepted for *Authorization to Share Information Using ServicePoint* documents—they must be signed with a wet signature or electronic signature.

#### Income Documentation

CHRP beneficiary households must provide documentation of their household income to ensure household income is at or below 80% AMI.

- If the household is employed, they must provide documentation of their pay such as pay stubs that cover the last 30 days.
- If the household is not employed but has other regular sources of income such as Social Security, retirement benefits, disability benefits, unemployment, TANF, or other public assistance, they must provide statements, award letters, or other documentation that shows the amount of income.
- If the household is not employed and has no other sources of income, they must provide a *Zero Income Certification Form*.
- If the household is self-employed, they must provide a Self-Income Certification Form.

#### Asset Documentation

CHRP beneficiary households must have less than \$7,500 in household liquid assets, including checking accounts, savings accounts, money market or Certificate of Deposit (CD) accounts, cash, or other liquid assets. Retirement accounts and college savings accounts are not liquid assets.

#### Documentation of COVID-19 Impact

CHRP beneficiary households must be able to provide evidence that their financial emergency is directly related to COVID-19. This includes financial impact due to second-order effects of the emergency, such as COVID-19-related business closures. The following is a list of eligible direct financial impacts and recommended documentation. Please note that this list is not exhaustive. Rental assistance providers are encouraged to utilize their best judgement when determining whether documentation provided by an applicant sufficiently provides evidence of financial impact due to COVID-19.

- **Financial Impact:** Required to be quarantined based on diagnosis of COVID-19. **Documentation**: A note from a healthcare provider.
- Financial Impact: Required to self-quarantine based on a directive of the Governor, the advice
  of a healthcare provider, or the advice or directive of a local or state public health authority, the
  directive of a law enforcement officer, or have reason to believe that self-quarantine is in the
  best interest of public health and human safety due to an exposure or high-risk activity.
   Documentation: A note from the applicant providing an explanation of the exposure or high-risk
  activity and an explanation of their reason to believe that self-quarantine was necessary. If
  applicable, this should be accompanied by a print-out of the directive.
- **Financial Impact**: Required to self-quarantine based on age over 65 or health condition that places him/her at enhanced risk for COVID-19.

**Documentation**: A note from the applicant providing an explanation of the enhanced risk and how the enhanced risk has prevented them from obtaining income.

- **Financial Impact**: Suffered a substantial loss of income from COVID-19, including job loss, reduction in compensation, closure of place of employment, obligation to be absent from work to care for home-bound school-aged child, or other pertinent circumstances.
  - **Documentation**: An email or letter from the applicant's place of work announcing the layoff, furlough, reduction in hours, or closure of place of employment. A notice from the child's school and/or daycare indicating that the child will need to be cared for at home.
- **Financial Impact**: Experienced a large unexpected medical cost related to COVID-19. **Documentation**: A medical bill.

#### Landlord Verification Form

The landlord verification form serves to confirm the rent amount and certifies that the landlord has not received payments from elsewhere. The form must be completed by the landlord and must be signed. Electronic signatures are acceptable.

#### **Utility Statements**

Applicants will be the head of household for the unit. Utility statements do not need to be in the applicant's name but should be in the name of a household member listed on the application.

#### Self-Certification for Continued Assistance

If the client has already submitted the initial application and is returning for additional assistance, a Self-Certification for Continued Assistance is required in lieu of a full application. If the client's income information has changed, backup documentation will be required with the form.

# **Utility Payment Information**

CHRP funding can pay for gas and electric bills not to exceed six months. If paying both rent and utility bills, the provider must ensure that the assistance covers only six consecutive calendar months.

The primary providers of gas in Lake County are Nicor Gas and North Shore Gas. The primary provider of electricity in Lake County is ComEd. Prior to paying the utility bill, providers must confirm with the utility company:

- 1. The balance of the bill.
- 2. That the bill has not already been paid by another utility assistance program (i.e., LIHEAP). If the bill has been assisted by another program, but there is a remaining balance after the assistance was applied, CHRP funding may be used to pay the remaining balance.
- 3. If the bill is past due and shutoff is a possibility, the provider must also confirm that the utility will not be shut off if the bill is paid.

The provider may confirm by calling the company or viewing the bill through the utility company's online bill pay portal.

Phone call: If the provider chooses to confirm by calling the company, the customer must give
permission to the utility company to discuss the details of the customer's account with a third

party (the utility assistance provider). The customer and provider may call the utility company together, either in the same room or via a three-way call, and the customer can provide permission over the phone. Alternatively, the customer may give permission ahead of time by calling the customer service line, in which case the customer does not need to be present when the provider calls the utility company. If the CHRP assistance is not enough to bring the customer's account up to date, the customer and provider may set up a payment plan for the remaining balance while on the phone call with customer service.

• Online portal: If the provider chooses to confirm by viewing the bill through the utility company's online bill pay portal, a copy of the bill should be printed and placed in the file. The copy should be dated the same date as the day the provider pays the bill.

# Utility company information

#### Nicor Gas:

- Customer Service Number: 888.Nicor4U (642.6748)
- o Hours: Mon-Fri 7:00am-6:00pm
- Best Time to Call: Unknown
- o Follow the prompt for: Press 3, ask to speak with a representative.
- Disconnections Due to Nonpayment: Currently suspended. No anticipated date for resuming shutoffs.
- Permissions: Clients may call ahead and put a note on their file to authorize Nicor to share information with the service provider.
- Website: <a href="https://www.nicorgas.com/">https://www.nicorgas.com/</a>

#### North Shore Gas:

- Customer Service Number: 866-556-6004
- o Hours: Mon-Fri 7:00am-7:00pm, Sat 7:00am-3:00pm
- o Best Time to Call: Mon-Fri 7:00am or 6:00-7:00pm
- Follow the prompt for: "Payment"
- Disconnections Due to Nonpayment: Currently suspended. No anticipated date for resuming shutoffs.
- Additional note: Wait time can be extensive. All late fees are currently being waived.
- O Permissions: Clients may call ahead and put a note on their file to authorize North Shore Gas to share information with the service provider. The client must have a specific name, such as a case manager, and the name must be put into the note as a "Related Customer" in order for the case manager to conduct business on the client's behalf.
- Website: https://accel.northshoregasdelivery.com/

#### ComEd:

- O Customer Service Number: 1-800-334-7661
- o Hours: Mon-Fri 7:00am-7:00pm
- Best Time to Call: Tues-Fri 11:00am-4:00pm
- o Follow the prompt for: Any customer service representative.
- Disconnections Due to Nonpayment: Currently suspended. Disconnections anticipated to become active on August 1, 2020.
- Permissions: Clients may call ahead and put a note on their file to authorize ComEd to share information with the service provider.
- Website: https://www.comed.com/Pages/default.aspx

# Reporting Requirements

Agencies must submit a monthly report by the 7<sup>th</sup> of each month. Monthly reports include:

- Voucher cover sheet
- Voucher backup documentation, including:
  - Application for each household where a payment was made (backup documentation does not need to be submitted). If the client is a return client, both the Self-Certification for Continued Assistance and original application should be submitted.
  - Landlord Verification Form
  - Timesheets and related back-up documentation for project delivery costs
- ServicePoint Client Served Report. The report is run and printed out of the database and should reconcile to the voucher and backup documentation.
- Townships must also include a Township Emergency Assistance Report.

# **Provider Contract Information**

#### **Award Amounts**

Nonprofit organizations and units of local government are eligible to apply to be CHRP providers. There is no minimum or maximum request amount. Initial funding awards are based on a tiered structure. Providers awarded funding may receive up to the maximum amount within the applicable tier.

| Tier   | Maximum Award | Description   |
|--------|---------------|---|
| Tier 1 | \$176,000     | Organizations with well-established existing partnerships with Lake   |
|        |               | County and a broad client base across the region                      |
| Tier 2 | \$110,000     | Organizations with well-established existing partnerships with Lake   |
|        |               | County and a local client base across a limited portion of the region |
| Tier 3 | \$37,400      | New partners  |

#### Eligible Costs

CHRP funding may be used only for direct assistance to low-income Lake County residents and costs associated with project delivery. Eligible costs include:

- Direct rental assistance for eligible beneficiaries
- Direct utility assistance for eligible beneficiaries
- Actual Project Delivery costs, including:
  - staff time utilized to:
    - income-qualify applicants
    - communicate with applicants and landlords
    - write and distribute checks
    - enter beneficiary data into ServicePoint
    - train staff on CHRP requirements
    - prepare and submit reports required by Lake County
    - other CHRP functions as applicable
  - o ther direct costs required in order to administer the program per the requirements described in this program manual